

*IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE*

NORTHEAST CONTROLS, INC.	:	CIVIL ACTION – LAW
and	:	
ST. PAUL MERCURY INSURANCE COMPANY	:	
	:	
	:	
v.	:	
	:	
	:	
FISHER CONTROLS INTERNATIONAL, LLC	:	NO. 1:06-CV-00412 (SLR)

NOTICE OF DEPOSITION DUCES TECUM

To: Daniel Gunter, Esquire
Riddell Williams, P.S.
1001 Fourth Avenue Plaza - Suite 4500
Seattle, WA 98154-1065

Paul A. Bradley, Esquire
Maron, Marvel, Bradley & Anderson, P.A.
1201 N. Market Street, Suite 900
P.O. Box 288
Wilmington, DE 19899

PLEASE TAKE NOTICE that the undersigned attorney will take the oral deposition of Robert A. Mostello, PE (ret), Ph.D., in the above-captioned matter on Friday, November 2, 2007, at 10:00 a.m., at our offices located at Marshall, Dennehey, Warner, Coleman & Goggin, 1220 N. Market Street, 4th Floor, Wilmington, DE 19989.

DUCES TECUM: The deponent is to bring the entire file, all documents referenced referred to, relied upon and referenced within your 'Report on Ordering of Valve 83HV0629 in Regard to the Accident at Delaware City, DE on May 20, 2000' that is dated September 4, 2007, and rebuttal report dated October 4, 2007, and addressed to Mr. Patrick D. McVey; as well as all published articles which you authored in whole or in part; and all sources, authorities, or reference materials upon which you relied in reaching the conclusions stated within the above-referenced reports dated September 4, 2007 and October 4, 2007.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN



By:

Thomas P. Wagner, Esquire
Attorney for Plaintiffs,
Northeast Controls, Inc. and St. Paul
Mercury Insurance Company
1845 Walnut Street – 21st Floor
Philadelphia, PA 19103
(215) 575-2600

/s/ Joseph Scott Shannon
Joseph Scott Shannon, Esquire (I.D. 3434)
1220 North Market Street, 5th Floor
P.O. Box 8888
Wilmington, DE 19899 – 8888
tel.: 302.552.4329
fax.: 302.651.7905

cc: Basye Santiago Court Reporting

15/541912.v1

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 12th day of October, a copy of the foregoing Notice of Deposition Duces Tecum was served via electronic mail and first class mail upon the following person(s):

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MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN



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